

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AHMAD SHREATEH,

Plaintiff,

v.

FANNIE MAE and
MARK HOLMES,

Defendants.

Civ. A. No. 04 11713-NMG

**JOINT STATEMENT OF AHMAD SHREATEH AND FANNIE MAE IN
PREPARATION FOR INITIAL SCHEDULING CONFERENCE**

In accordance with the Court's Notice of Scheduling Conference, Fed. R. Civ. P. 26 and Local Rule 16.1 of the United States District Court of Massachusetts, the plaintiff Ahmad Shreateh and defendant Fannie Mae (the "parties")¹ hereby submit the following proposed pretrial schedule:

I. PROPOSED PRETRIAL SCHEDULE

A. Discovery Plan.

<u>Deadline</u>	<u>Event</u>
December 16, 2004	Exchange Initial Disclosures
December 30, 2004	Amendments to pleadings (including amendments to add parties), third-party actions, cross-claims and counterclaims
August 8, 2005	Close of fact discovery, completion of all written discovery and non-expert depositions

¹ Defendant Holmes has not received service of process in connection with this lawsuit. Plaintiff has filed a motion seeking to serve Mr. Holmes late, which Mr. Holmes, by special appearance, has opposed.

To be determined

A pretrial conference, if necessary following decision on dispositive motions, with all dates following such pretrial conference, including expert disclosure and discovery, to be scheduled at the Court's discretion

B. Phased Discovery. The parties do not believe it is necessary for discovery to proceed in "phases," except as set forth in its proposed discovery schedule, at Section A above.

C. Motion Schedule. The parties propose that any dispositive motions, together with all supporting documents shall be served no later than October 7, 2005. All oppositions with supporting documents shall be served no later than November 7, 2005. All replies to oppositions with supporting documents shall be served no later than December 7, 2005.

II. PENDING MOTIONS

The following motions and related pleadings are currently pending before the Court:

Plaintiff's Motion to Amend Complaint to Conform to Rules 8 & 10

Plaintiff's Affidavit to Sever Summons Upon Defendant Mark Holmes – Late – With An Amended Complaint

Mark Holmes' Opposition by Special Appearance to Plaintiff's Request for an Extension of Time in Which to Complete Service

Plaintiff's Opposition to Defendant Fannie Mae's Opposition, by way of Special Appearance, to Plaintiff's Request for an Extension of Time to Make Amended Service

Plaintiff's Motion to Amend Summons to Mark Holmes

Plaintiff's Memorandum in Support of Motion to Amend Summons to Mark Holmes

III. CERTIFICATIONS UNDER LOCAL RULE 16.1(D)(3)

The parties and their counsel hereby certify that each party and that party's counsel have conferred with a view to establishing a budget for the costs of conducting litigation at issue in this matter and to consider the resolution of the litigation through the use of alternative dispute resolution programs. Pursuant to Local Rule 16.1(D)(3), Fannie Mae submits its Certification of Conference herewith, and the Plaintiff submits his Certification of Conference under separate cover.

FANNIE MAE
By its attorneys,

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